



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1445 North Orchard • Boise, Idaho 83706-2239 • (208) 373-0550

Dirk Kempthorne, Governor
C. Stephen Allred, Director

August 3, 2000

CERTIFIED MAIL #P241 836 526

Mr. W.H. Landon, President
EPSCO Corporation
108 W. 37th Street
Boise, ID 83714

RE: T2-000002, EPSCO, Boise, Idaho, Final Tier II Operating Permit No. 001-00155, Abrasive Blasting and HVLP Painting Processes

Dear Mr. Landon:

On January 12, 2000, Idaho Department of Environmental Quality (DEQ) received an application for a Tier II Operating Permit (OP) from the EPSCO Corporation. On February 18, 2000, the application was declared complete.

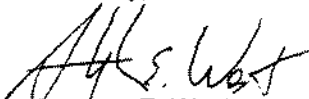
On May 31, 2000, a proposed Tier II OP was issued for public comment. The public comment period was from May 31, 2000 through July 3, 2000. No public comments were received.

Based on review of your application, and state and federal rules and regulations, DEQ finds this project meets the provisions of IDAPA 16.01.01.400 (*Rules for the Control of Air Pollution in Idaho*). Therefore, enclosed is the final Tier II OP (#001-00155) for the emissions that exist at your facility.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Health and Welfare, Administrative Procedures Section, 450 West State Street -10th Floor, Boise, Idaho, 83720-5450, within thirty-five (35) days of the date of this decision.


If you have any questions regarding the terms or conditions of the enclosed permit, please contact Tom Krinke, of the Boise Regional Office, at (208) 373-0550.

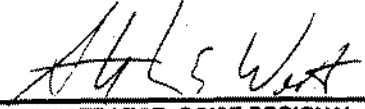
Sincerely,


Stephen E. West
Regional Administrator
Boise Regional Office

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Enclosure

cc: DEQ State Office 
Boise Regional Office
L. Kral, EPA- Region 10

<p>STATE OF IDAHO</p> <p>AIR POLLUTION OPERATING PERMIT</p> <p>GENERAL INFORMATION</p>	<p>PERMIT NUMBER</p> <p>001 - 00155</p> <p>AQCR CLASS SIC</p> <p>064 A2 3479</p> <p>ZONE UTM COORDINATE (km)</p> <p>11 561 8 4831 7</p>		
<p>1. PERMITTEE</p> <p>EPSCO Corporation</p>			
<p>2. PROJECT</p> <p>Tier II Operating Permit - Abrasive Blasting and HVLP Spray Painting</p>			
<p>3. MAILING ADDRESS</p> <p>108 west 37th Street</p>	<p>TELEPHONE #</p> <p>(208) 389-2000</p>	<p>COUNTY</p> <p>Ada</p>	
<p>4. CITY</p> <p>Boise</p>	<p>STATE</p> <p>Idaho</p>	<p>ZIP CODE</p> <p>83714</p>	
<p>5. PERSON TO CONTACT</p> <p>W.H. Landon</p>	<p>TITLE</p> <p>President</p>		
<p>6. EXACT PLANT LOCATION</p> <p>108 West 37th Street</p>			
<p>7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS</p> <p>Abrasive Blasting and Industrial Coating Applications</p>			
<p>8. PERMIT AUTHORITY</p> <p>This permit is issued according to the Rules for the Control of Air Pollution in Idaho, Section 16.01.01.400 and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be operated by this permit.</p> <p>THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF DESIGN INFORMATION PRESENTED IN THE APPLICATION AND DEPARTMENT OF ENVIRONMENTAL QUALITY'S (DEQ) TECHNICAL ANALYSIS OF THE SUPPLIED INFORMATION. CHANGES IN DESIGN OR EQUIPMENT, THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MAY BE A MODIFICATION. MODIFICATIONS ARE SUBJECT TO DEQ REVIEW IN ACCORDANCE WITH SECTION 16.01.01.200 OF THE RULES FOR THE CONTROL OF AIR POLLUTION IN IDAHO.</p>			
<p></p> <p>ADMINISTRATOR, BOISE REGIONAL OFFICE</p> <p>DEPARTMENT OF ENVIRONMENTAL QUALITY</p> <p>August 3, 2000</p>			

**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

EPSCO Corporation
Tier II Operating Permit
Boise, ID 83714

PERMIT NUMBER

0 0 1 - 0 0 1 5 5

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Abrasive Blasting

1. EMISSIONS LIMITS

1.1 PM-10 Emission Limits

Particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM-10) emissions from the abrasive blast booth filter vent shall not exceed any corresponding emission rate limits listed in Appendix A of this permit.

1.2 Opacity Limit

Emissions from the abrasive blast booth vent, or any other stack, vent, or functionally equivalent opening at the facility, shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period as required by IDAPA 16.01.01.625 (*Rules for the Control of Air Pollution in Idaho*). Opacity shall be determined by the procedures contained in IDAPA 16.01.01.625.

2. OPERATING REQUIREMENTS

2.1 Hours of Operation Limits

The abrasive blast booth's operating hours shall not exceed a maximum of twelve hours per day (12.0 hr/day), or four thousand, four hundred eighty-five hours per any consecutive 12-month period (4,485 hr/yr).

2.2 Abrasive Blast Booth Filter Maintenance

Within sixty (60) days after the issuance date of this permit, the Permittee shall have developed a Blast Booth filter replacement plan which describes the frequency for filter replacements. A log shall also be maintained which shows the date for each filter replacement. The most recent two (2) years' compilation of data shall be kept on site and made available to DEQ representatives upon request.

2.3 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 16.01.01.650-651.

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EPSCO Corporation
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PERMIT NUMBER

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SOURCE

Abrasive Blasting

3. MONITORING AND RECORDKEEPING REQUIREMENTS
3.1 Monitor Operating Parameters

The Permittee shall monitor and record, when in operation, the abrasive blast booth's operating hours. Operating hours shall be recorded as hours per day (hr/day) and hours per month (hr/mo). The most recent two (2) years' compilation of monitoring records shall be kept on site, in a log, and made available to DEQ representatives upon request.

3.2 Fugitive Dust Log

The permittee shall maintain a log of all fugitive dust complaints received. The permittee shall take corrective action as soon as reasonably possible, but no later than twenty-four (24) hours after a valid complaint is received, unless the permittee demonstrates to the Department's satisfaction that the longer response time was necessary. The log shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, and any corrective action taken.

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SOURCE

HVLP Spray Painting Process

1. EMISSIONS LIMITS
1.1 PM-10 Emission Limits

Particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM-10) emissions from the HVLP spray paint booth filter vent shall not exceed any corresponding emission rate limits listed in Appendix A of this permit.

1.2 Opacity Limit

Emissions from the HVLP spray painting booth vent, or any other stack, vent, or functionally equivalent opening at the facility, shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period as required by IDAPA 16.01.01.625 (*Rules for the Control of Air Pollution in Idaho*). Opacity shall be determined by the procedures contained in IDAPA 16.01.01.625.

2. OPERATING REQUIREMENTS
2.1 Hours of Operation Limits

The HVLP spray painting booth's operating hours shall not exceed a maximum of six hours per day (6.0 hr/day) or two thousand, twenty hours per any consecutive 12-month period (2,020 hr/yr).

2.2 Paint Products

Paint products used in the HVLP spray painting process shall not contain volatile organic compounds (VOC's) or hazardous air pollutants (HAP's) in excess of the amounts indicated on the Material Safety Data Sheets (MSDS's) submitted by the Permittee for this Operating Permit.

2.3 HVLP Spray Paint Booth Filter Maintenance

Within sixty (60) days after the issuance date of this permit, the Permittee shall have developed a HVLP Spray Paint Booth filter replacement plan which describes the frequency for filter replacements. The filter replacement plan shall be kept at the facility and shall be made available to DEQ representatives upon request. A log shall also be maintained which shows the date for each filter replacement. The most recent two (2) years' compilation of data shall be kept on site and made available to DEQ representatives upon request.

2.4 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 16.01.01.650-651.

**AIR POLLUTION OPERATING PERMIT
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SOURCE

HVLP Spray Painting Process

2.5 Odors

In accordance with IDAPA 16.01.01.776, the Permittee shall not allow, suffer, cause or permit the emissions of odorous gases, liquids, or solids into the atmosphere in such quantities as to cause air pollution.

3. MONITORING AND RECORDKEEPING REQUIREMENTS

3.1 Monitor Operating Parameters

The Permittee shall monitor and record, when in operation, the HVLP spray painting booth's operating hours. Operating hours shall be recorded as hours per day (hr/day) and hours per month (hr/mo). The most recent two (2) years' compilation of monitoring records shall be kept on site, in a log, and made available to DEQ representatives upon request.

3.2 Paint Products

The Permittee shall maintain MSDS's for all paint products including, but not limited to, paints, tint bases, and solvents used in the HVLP spray painting process. The MSDS's shall be maintained in such a fashion so that compliance with the terms and conditions of this permit can be easily demonstrated. The MSDS's shall remain on-site at all times and be made available to DEQ representatives upon request.

3.2 Fugitive Dust Log

The permittee shall maintain a log of all fugitive dust complaints received. The permittee shall take corrective action as soon as reasonably possible, but no later than twenty-four (24) hours after a valid complaint is received, unless the permittee demonstrates to the Department's satisfaction that the longer response time was necessary. The log shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, and any corrective action taken.

3.3 Odor Log

The permittee shall maintain a log of odor complaints received. The log shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, and any corrective

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SOURCE

HVLP Spray Painting Process

action taken. If the complaint has merit the permittee shall take corrective action, as soon as reasonably possible, but no later than twenty-four (24) hours after a valid complaint of odor is received, unless the permittee demonstrates to the Department's satisfaction that the longer response time is necessary.

4. REPORTING REQUIREMENTS**4.1 Certification of Documents**

All documents including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, and compliance certifications submitted to DEQ shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

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SOURCE

Appendix A

Appendix A
EPSCO Corporation

Emission Limits* - Daily, pound-per-day (lb/day) and Annual, ton-per-year (T/yr)

STACK DESCRIPTION	PM-10	
	lb/day	T/yr
Abrasive Blast Booth Vent	0.60	0.11
HVLP Spray Painting Booth Vent	0.03	0.11

- a. As determined by a pollutant specific U.S. EPA reference method, DEQ approved alternative, or as determined by DEQ's emission estimation methods used in the permit application analysis.

TIER II OPERATING PERMIT GENERAL PROVISIONS

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the **Rules for the Control of Air Pollution in Idaho**, and the Environmental Protection and Health Act, Idaho Code 39-101 et. seq.
- B. The Permittee shall at all times (except as provided in the **Rules for the Control of Air Pollution in Idaho**) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The Permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the Permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - 2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing (i.e., performance tests) in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 39-111, **Idaho Code**, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environmental Quality.
- E. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the Permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the Permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the Permittee to develop a list of Operation and Maintenance Procedures which must be approved by DEQ. Such list of procedures shall become a part of this permit by reference, and the Permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I. Performance tests (i.e.; air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 16.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the Permittee obtains prior DEQ approval.

The Permittee shall submit a proposed test date for each performance test required by this permit to DEQ for approval at least fifteen (15) days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The Permittee shall promptly notify DEQ of any change in the proposed test date and shall provide at least five (5) working days advanced notice prior to conducting any rescheduled test, unless DEQ approves a shorter notice period.

Within thirty (30) days of the date on which a performance test required by this permit is concluded, the Permittee shall submit to DEQ a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by DEQ, which demonstrated compliance with the respective pollutant emission limit unless; (1) a more restrictive operating limit is specified elsewhere in this permit or; (2) at such an operating rate, emissions

would exceed any emission limit(s) set forth in this permit.

- J. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.